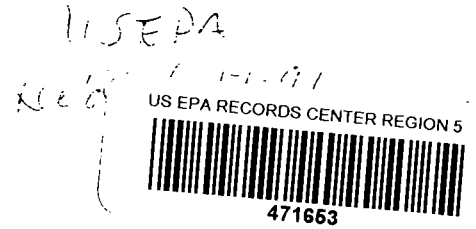


Lead Smelter and Refiner

14 May 1991



United States Department of Justice
Environmental Enforcement Section
P.O. Box 7611
Ben Franklin Station
Washington, D.C.

U.S. Attorney for the Northern District of Ohio
1404 East Ninth Street
Cleveland, Ohio 44114

Ohio Environmental Protection Agency
Northeast District Office
Division of Solid and Hazardous Waste
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Section Chief
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
1800 Watermark Drive
P.O. Box 1049
Columbus, Ohio 43265-1049

Branch Chief
U.S. EPA, Region V
RCRA Enforcement Branch, 5hr-12
230 South Dearborn Street
Chicago, Il 60604

RE: Monthly Status Report
1 May 1991 to 31 May 1991

In accordance with the reporting requirements of Section X.A. of the Consent Decree, the following is a description of the measures Master Metals has taken in the month of May and additional measures that will be taken to comply with the requirements of the Consent Decree.

Waste Characterization

Analysis of slag for the months of April and May indicate that the slag is not a characteristic hazardous waste for metals. A copy of the laboratory results are attached.

Financial Insurance

Lloyds of London has proposed an environmental impairment liability (EIL) policy which meets the requirements of the regulations. Master Metals is awaiting approval from the Government in regards to the proposed policy. Upon approval Master Metals will immediately enter into an agreement with Lloyds of London for EIL coverage.

Financial Assurance

A Trust Fund was established for funding the facility closure costs. Master Metals understands that it is the Governments' position that financial assurance was to be established by the effective date of the regulations in 1983.

Master Metals currently does not have the liquid funds to fully fund the facility closure Trust to the level required. Therefore, Master Metals has submitted to USEPA, under separate cover, a proposed payment plan which will fund the Trust to the required level by April 1992. Beginning in 1992, Master Metals will provide annual payments to the Fund in conformance with Part 265.143 (a)(3)(ii).

Partial closure is being financially assured through a certificate of deposit. The government has requested that a certificate of deposit not be used as a financial assurance mechanism. Therefore, Master Metals will establish an additional Trust Fund to fund partial closure activities.

Master Metals believes that \$16,207.84 (current value of the certificate of deposit) is sufficient to complete the partial closure plan. To date Master Metals has removed all waste piles consisting of lead-containing feedstocks. In addition, Master Metals has conducted soil and groundwater sampling and analyses at a cost of \$27,198.00.

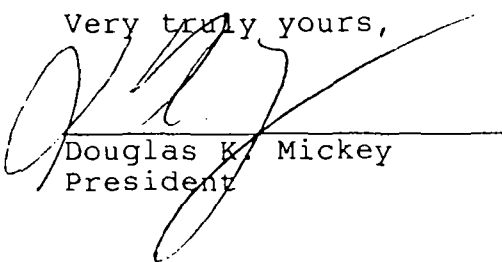
page 3

Master Metals believes that certain activities detailed in its partial closure plan are more appropriately conducted during full facility closure. Master Metals will submit a revised partial closure plan.

Certification:

I certify that the information explained in or accompanying this document is true, accurate, and complete.

Very truly yours,



Douglas K. Mickey
President

cc: Michael Cyphert
Thompson, Hine, and Flory

rec'd 5/17/91

Occupational
Medicine

Safety &
Industrial
Hygiene

BHM

Environmental
Services

20690 Lakeland Blvd.
Euclid, OH 44119

**Environmental
Laboratory**
7145 Pine St.
Chagrin Falls, OH 44022

WORK ORDER NUMBER: 0997, 0998

CUSTOMER: COMPLIANCE TECHNOLOGIES, INC.
4510 EAST 71ST STREET
CUYAHOGA HEIGHTS, OH 44105

CUSTOMER NO: P.O. 1009

CONTACT: STEVE KOVACH

SAMPLE DESCRIPTION/SAMPLE ID NO:

	<u>CTI ID</u>	<u>BHM ID</u>
2 SAMPLES:	M-91	0997
	A-91	0998

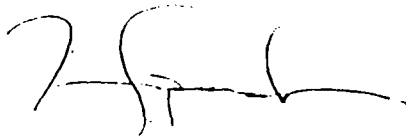
PROJECT NAME: MASTER METALS, INC.

DATE RECEIVED: MAY 23, 1991

DATE REPORTED: MAY 29, 1991

TESTS REQUESTED: TCLP METALS

REVIEWED BY:



APPROVED BY:



CUSTOMER: CFI, INC.

WORK ORDER NO: 0998

SAMPLE ID: A-91 APRIL

PROJECT NAME: MASTER METALS

DATE RECEIVED: 05-23-91

DATE REPORTED: 05-29-91

TCLP EXTRACTION
METALS

METHOD NO. 1311

	<u>PARAMETER</u>	<u>RESULTS</u> <u>(MG/L)</u>	<u>REGULATORY</u> <u>LEVEL (MG/L)</u>	<u>INSTRUMENT</u> <u>DETECTION</u> <u>LIMIT (MG/L)</u>	<u>METHOD</u> <u>NUMBER</u>
1.	ARSENIC	<0.10	5.0	0.04	6010
2.	BARIUM	19.6	100.0	0.02	6010
3.	CADMIUM	<0.02	1.0	0.01	6010
4.	CHROMI	<0.02	5.0	0.02	6010
5.	LEAD	0.23	5.0	0.04	6010
6.	MERCURY	<0.04	0.2	0.02	245.1
7.	SELENIUM	<0.10	1.0	0.04	6010
8.	SILVER	<0.02	5.0	0.02	6010
9.	NICKEL	<0.02	---	0.02	6010

NOTE: DETECTION LIMITS MAY VARY DUE TO SAMPLE MATRIX

CUSTOMER: CTE, INC.

WORK ORDER NO: 0997

SAMPLE ID: M-01 MAY

DATE RECEIVED: 05-23-91

DATE REPORTED: 05-29-91

PROJECT NAME: MASTER METALS

TCLP EXTRACTION
METALS

METHOD NO. 1311

<u>PARAMETER</u>	<u>RESULTS</u> <u>(MG/L)</u>	<u>REGULATORY</u> <u>LEVEL (MG/L)</u>	<u>INSTRUMENT</u> <u>DETECTION</u> <u>LIMIT (MG/L)</u>	<u>METHOD</u> <u>NUMBER</u>
1. ARSENIC	<0.10	5.0	0.04	6010
2. BARIUM	18.7	100.0	0.02	6010
3. CADMIUM	<0.02	1.0	0.01	6010
4. CHROMIUM	<0.02	5.0	0.02	6010
5. LEAD	<0.10	5.0	0.04	6010
6. MERCURY	<0.04	0.2	0.02	245.1
7. SELENIUM	<0.10	1.0	0.04	6010
8. SILVER	<0.02	5.0	0.02	6010
9. NICKEL	<0.02	---	0.02	6010

NOTE: DETECTION LIMITS MAY VARY DUE TO SAMPLE MATRIX